

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Dionte Young,)
)
 Plaintiff,) 17 C 1914
)
 vs.) Honorable Judge
) Sara Ellis
)
)
 Dart, et. al Defendants.)

**MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD, AND FOR RELATED MDIP
DISCLOSURES**

NOW COME the Defendants, Cook County Sheriff's Office, Thomas Dart, Officer J. Oomens, Officer A. Sanchez, and Cook County Jail, by their attorney KIMBERLY M. FOXX, State's Attorney of Cook County, through her assistant, Bianca B. Brown, pursuant to Federal Rule of Civil Procedure 15(a)(3), and respectfully moves this Court for an extension of time of 28 days to answer or otherwise plead to Plaintiff's Second Amended Complaint. In support of this motion, Defendants state the following:

1. Plaintiff initially filed his Complaint in this matter on February 17, 2017. (Dkt. 2.)
2. Appointed Counsel for Plaintiff filed an amended complaint on July 18, 2018. (Dkt. 38)
3. Defendants Dart was served on June 14, 2018 from the filing of the original complaint, triggering a due date for his responsive pleading of August 14, 2018. Defendants

Officer A. Sanchez and Officer J. Oomen was served on July 18, 2018 triggering a due date of September 18, 2018 after the amended complaint was filed.

4. The Counsel for Defendant requests an enlargement of time to answer or otherwise plead for all Cook County Defendants of 28 days, up to and including Monday, September 10, 2018.

5. This request for enlargement of time is made in good faith and not to delay or prejudice the Plaintiff. Rather, it is to allow undersigned counsel to properly investigate Plaintiff's allegations and claims, discuss this matter with Defendants, and to prepare an answer or other responsive pleading to Plaintiff's allegations.

6. This is Defendants' first request for an extension of time to answer or otherwise plead.

7. Defendants respectfully request that this Court grant this Motion for an Extension of Time to Answer or Otherwise Plead, as well as for an extension of time as to any mandatory initial disclosures.

WHEREFORE, the Defendants respectfully request that this Honorable Court grant the following relief:

- (a) An enlargement of time to September 10, 2018 to file an answer or otherwise plead; and,
- (b) An enlargement of time for the due date of any mandatory initial disclosures based on that new date for Defendants' answer; and
- (c) To grant any other relief it deems necessary and just.

Respectfully submitted,

Kimberly M. Foxx
State's Attorney of Cook County

By:

/s/ Bianca B. Brown

Bianca B. Brown
Assistant State's Attorney
Civil Actions Bureau
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-6638

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing to be served on Plaintiff's Counsel pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 8th day of August, 2018.

/s/ Bianca B. Brown
Bianca B. Brown